

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Xiafen “Sherry” Chen,

Plaintiff,

v.

United States of America,

Defendant.

Case No. 1:19-CV-00045

Hon. Timothy S. Black

JOINT STATUS REPORT REGARDING SETTLEMENT NEGOTIATIONS

On April 22, 2022, this Court granted Plaintiff’s unopposed motion to stay the deadline to file a motion for leave to amend the complaint and ordered the parties to file a joint status report updating the Court on their settlement negotiations within 30 days. Since then, the parties have continued to make progress towards a settlement agreement. On May 13, 2022, counsel for Defendant sent a settlement proposal to counsel for Plaintiff. Plaintiff and her counsel are currently considering the government’s proposal and are in the process of formulating a counterproposal. The parties remain interested in reaching a settlement and believe that an agreement acceptable to all parties is possible. Accordingly, they jointly request that the Court continue to stay the deadline to file a motion for leave to amend the complaint and order the parties to file another joint status report in 30 days.

Respectfully submitted,

/s/ John Hemann

John Hemann
Attorney for Plaintiff

/s/ Matthew J. Horwitz

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CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing was filed electronically on May 20, 2022 using the Court's CM/ECF system, which serves copies to all parties of record.

/s/ John Hemann
John Hemann
Attorney for Plaintiff